Exhibit B



Reply to the Attention of Direct Line Direct Fax

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Brett Harrison

Our File No. 66591 Date March 2, 2011

E-MAIL

Mr. Jonathan Lundy
Senior Vice President, General Counsel
& Corporate Secretary
Atomic Energy of Canada Limited
2251 Speakman Drive
Mississauga, Ontario L5K 1B2
Email: lundyj@aecl.ca

Dear Mr. Lundy:

Re: Lantheus Medical Imaging, Inc. v. Zurich American Insurance Company

We act as Canadian counsel for Lantheus Medical Imaging, Inc. ("Lantheus") in the above noted matter. Lantheus recently filed a lawsuit in the United States against its insurance company, Zurich American Insurance Company ("Zurich"), seeking payment of losses that it sustained as a result of the shutdown of the Chalk River National Research Universal ("NRU") reactor in May 2009. By this letter, Lantheus asks that Atomic Energy Canada, Limited ("AECL") voluntarily provide Lantheus with the documents and information identified on Exhibit 1.

The information that Lantheus is asking AECL to voluntarily produce is highly relevant to the U.S. lawsuit between Lantheus and Zurich. As you know, the NRU reactor produces molybdenum-99 ("moly"), a critical raw material used by Lantheus in manufacturing its radiopharmaceutical products. As a result of the May 2009 shutdown of the NRU reactor, the supply of moly was interrupted for an extended period, and Lantheus incurred a substantial loss of income. Lantheus contends, in its U.S. lawsuit, that those losses are covered under an insurance policy it purchased from Zurich. Zurich has denied coverage based upon contentions that the NRU reactor shutdown was caused by, among other things, "low standards" at the NRU reactor, "errors in, or faulty, inadequate or defective ... construction ... design ... renovation, specifications, workmanship, installation or process," "[e]rrors in, or faulty, inadequate or defective [m]aintenance," a "latent defect" in the reactor, and the effects of "corrosion." The documents sought by Lantheus from AECL pertain to the reasons for, and events surrounding the NRU reactor shutdown, which are central issues in the U.S. lawsuit.



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Lantheus is mindful of the time involved in responding to a request for documents such as this one, and has attempted to make its document requests as narrow as reasonably possible in the circumstances. We are writing you now to request voluntary production of these documents in the hope of avoiding the use of formal process, and I am happy to discuss with you any reasonable accommodations that Lantheus can make with AECL to facilitate production of these materials.

Given the schedule for discovery in this proceeding we would ask that you please provide us with a response by no later than March 15, 2011

Yours truly,

Brett Harrison

/wl

cc: Rukesh Korde, Covington & Burling LLP

EXHIBIT 1

The term "documents" as used below includes reports, memoranda, data or analysis of data.

- 1. The documents that AECL relied upon in reaching the conclusions identified below in its presentations (and any associated written testimony or reports) to the Canadian Nuclear Safety Commission ("CNSC") of January 20, 2011 and July 5, 2010:
- (a) <u>January 20, 2011 presentation</u>: conclusions regarding (i) root causes of the NRU reactor vessel leak, (ii) maintenance of the carbon dioxide concentration and improvements to the carbon dioxide system, in the J-Ring Annulus ("the Annulus") of the NRU reactor, (iii) human performance issues, (iv) the drain system in the Annulus, and (v) defective fuel issues.
- (b) <u>July 5, 2010 presentation</u>: conclusions regarding (i) causes of the heavy water leak in the NRU reactor, (ii) damage and other effects of the heavy water leak to the NRU reactor, and (iii) the statement that "corrosion ha[d] been progressing" at the time of the license renewal in 2007.
- 2. The documents that AECL relied upon in reaching conclusions regarding the cause of the leak in the NRU reactor, the damage mechanism or the condition assessment of the NRU reactor, as set forth in the following presentations (and any associated written testimony or reports):
- (a) the presentation to the House of Commons Standing Committee on Natural Resources meeting on October 19, 2009;
 - (b) the presentation to the CNSC on August 27, 2009;
- (c) the presentation to the House of Commons Standing Committee on Natural Resources on August 21, 2009;
 - (d) the presentation to the CNSC on July 8, 2009;
 - (e) the presentation to the CNSC on June 11, 2009; and
- (f) the presentation to the House of Commons Standing Committee on Natural Resources on June 4, 2009.
- 3. The documents which AECL considered or reviewed in evaluating whether or not radiation caused or contributed to an alteration of the micro-structure of the aluminum alloy

composing the NRU reactor vessel, and whether any such alteration caused or contributed to the May 2009 shutdown of the NRU reactor.

- 4. The documents which AECL considered or reviewed in evaluating the cause or causes of the nitric acid formation in the Annulus of the NRU reactor.
- 5. The documents which AECL considered or reviewed in evaluating the nitric acid concentration in the Annulus of the NRU reactor at the time of or during the period prior to the May 2009 NRU reactor shutdown.
- 6. The documents which AECL considered or reviewed in evaluating carbon dioxide flow rates, variations of such flow rates and air leakage in or into the NRU reactor or the Annulus at the time of or during the period prior to the May 2009 NRU reactor shutdown.
- 7. The documents which AECL considered or reviewed in evaluating whether or not water drainage difficulties or obstructions to water drainage in the Annulus of the NRU reactor at the time of or during the period prior to the May 2009 NRU reactor shutdown caused or contributed to that shutdown.
- 8. Documents reporting on the results of inspections and scans of the NRU reactor vessel conducted in 2004, 2005, 2009, 2010 and 2011.
- 9. The results of any coupon tests, that is, tests regarding the damage mechanism, of the NRU reactor vessel following the May 2009 NRU reactor shutdown.
- 10. Documents graphically or numerically depicting the specific locations of the damage to the NRU reactor vessel (including "pitting" or leak holes) at the time of the shutdown.
- 11. Documents describing damage to the NRU reactor that could be or were caused by a heavy water leak.
- 12. The documents which AECL considered or reviewed in evaluating whether or not defective fuel had any role in causing or contributing to the May 2009 shutdown of the NRU reactor.
- 13. The documents which AECL considered or reviewed in evaluating whether or not any chemicals or dessicants were introduced into or found in the Annulus or water in the Annulus space at the time of or during the period prior to the May 2009 NRU reactor shutdown.
- 14. The manuals, guidelines or written procedures, or the portions of such manuals, guidelines or written procedures, applicable to the maintenance and inspection of the NRU reactor in force in May 2009.